

**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
DOCKET NO. 2019-182-E**

IN RE:)
)
South Carolina Energy Freedom Act)
(H.3659) Proceeding Initiated Pursuant to)
S.C. Code Ann. Section 58-40-20(C):)
Generic Docket to (1) Investigate and)
Determine the Costs and Benefits of the)
Current Net Energy Metering Program and)
(2) Establish a Methodology for Calculating)
the Value of the Energy Produced by)
Customer-Generators)
_____)

**RESPONSIVE TESTIMONY OF
ODETTE MUCHA ON BEHALF OF
VOTE SOLAR**

October 29, 2020

1 **Q. PLEASE STATE YOUR NAME, OCCUPATION AND BUSINESS**
2 **ADDRESS.**

3 A: My name is Odette Mucha. I am the Southeast Regulatory Director of Vote Solar.
4 My business address is 1100 Connecticut Ave NW, Washington, DC 20036.

5 **Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND**
6 **PROFESSIONAL EXPERIENCE.**

7 A. I am an energy policy professional, specializing in policies and programs that
8 expand solar access. I worked for eight years in the Federal Government, at the
9 U.S. Department of Defense, U.S. Department of Energy and the White House,
10 managing energy and transportation initiatives. Specifically, I led the U.S.
11 Department of Energy's research on community solar and low-income solar, and
12 spearheaded a White House initiative to expand solar access. Separately, I
13 managed the District of Columbia's low-income solar access grant program. For
14 Vote Solar, I focus on regulatory topics in the Southeast, including in the
15 Carolinas, Florida and Virginia. I have a master's degree from Tufts University
16 and bachelor's degree in Political Science from Cornell University. My
17 curriculum vitae is attached as Exhibit No. OM-1.

18 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING?**

19 A. Vote Solar.

20 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE PUBLIC**
21 **SERVICE COMMISSION OF SOUTH CAROLINA ("COMMISSION")?**

22 A. No. I am pleased to testify for the first time here in this proceeding.

1 **Q. WHAT IS THE PURPOSE OF YOUR RESPONSIVE TESTIMONY IN**
 2 **THIS PROCEEDING?**

3 A. The purpose of my testimony is to respond to the direct testimony submitted by
 4 witness John Ruoff on behalf of the Office of Regulatory Staff (“ORS”). While
 5 the issues of energy burden and equitable energy policy are important and worthy
 6 of Commission attention in many energy proceedings, I respectfully suggest that
 7 they are not particularly relevant to the process of developing a cost-benefit
 8 methodology or to quantifying any value required by The Energy Freedom Act
 9 (“Act 62”).¹

10 **Q. WHAT IS THE PURPOSE OF THIS PROCEEDING?**

11 A. The purpose of this proceeding is to investigate and determine the costs and
 12 benefits of the utilities’ current net energy metering programs and to investigate
 13 and to establish a methodology for calculating the value of the energy produced
 14 by customer-generators. Per Commission Order Nos. 2020-570 and 2020-622,
 15 Commission consideration and hearing on utility-specific solar choice metering
 16 tariff applications will occur separately (in separate dockets and according to
 17 different procedural deadlines).

18 **Q. DID ORS WITNESS RUOFF’S TESTIMONY ADDRESS**
 19 **METHODOLOGIES NEEDED TO COMPLY WITH ACT 62?**

¹ S.C. Code Ann. Section 58-40-20(C).

1 A. No, ORS Witness Ruoff does not address cost-benefit or solar valuation
2 methodology or quantification of costs or benefits of the existing net metering
3 program.

4 **Q. WHAT DID ORS WITNESS RUOFF'S TESTIMONY ADDRESS?**

5 A. Witness Ruoff's testimony raises several general concerns about energy
6 affordability and rightfully points out that the energy burden of the lowest income
7 households of South Carolina is far too high. We wholeheartedly agree that it is
8 important to reduce the energy burden of families most in need, especially now
9 with the economic devastation resulting from the COVID-19 pandemic. As
10 Witness Ruoff describes, there is a tragic link between high energy burden and
11 evictions. These are important issues, but they do not relate specifically to the
12 methodology for calculating the value of energy produced by customer-generators
13 through net energy metering. While Witness Ruoff discusses net metering
14 conceptually through an equity lens, he does not provide any quantitative analysis
15 or supporting evidence to demonstrate whether net metering has a negative or
16 positive impact on other customers.

17 **Q. WHAT WOULD BE A MORE APPROPRIATE PROCEEDING FOR THE**
18 **ISSUES RAISED BY ORS WITNESS RUOFF'S?**

19 A. Vote Solar believes the forthcoming, utility-specific solar choice tariff
20 proceedings are the appropriate forum in which to discuss the various policy
21 points raised by Witness Ruoff, as it concerns the impact and adequacy of any
22 solar choice tariff proposal. Within the utility-specific solar choice tariff

1 proceedings, all interested parties will have the chance to discuss policy and
2 programmatic recommendations related to the tariffs.

3 **Q. IS ENERGY BURDEN AN IMPORTANT CONCERN?**

4 A. Yes, it most certainly is.

5 **Q. ARE THERE CLEAN ENERGY SOLUTIONS THAT CAN REDUCE**
6 **ENERGY BURDEN?**

7 A. Yes. Energy burden can be addressed through clean energy policy in a multitude
8 of ways. Other jurisdictions have addressed low-income concerns through energy
9 efficiency, rooftop and community solar, demand response, income-based
10 payment plans, arrearage management plans, low-income specific discounted
11 rates, and by simply reducing overall energy system costs to lower all customers'
12 rates.

13 **Q. ARE YOU RECOMMENDING TO THE COMMISSION THAT IT ADOPT**
14 **ANY OF THESE POLICIES IN THIS PROCEEDING?**

15 A. No. For purposes of this generic docket, I do not believe any specific low-income
16 policy recommendations are within the scope of the proceeding. Vote Solar has
17 previously made recommendations to the Commission in Docket No. 2020-106-A
18 on how such policies and clean energy programs could be used to reduce COVID-
19 related arrearages and address the structural issue of energy burden in South
20 Carolina. I would add that equity issues are also centrally important in the context
21 of a general rate case, where rates are set and the Commission must weigh the
22 equity implications inherent in rate design and overall approved revenue
23 requirements.

Responsive Testimony of Odette Mucha on Behalf of Vote Solar
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1 **Q. SPECIFICALLY, ARE THERE POLICIES THAT OTHER**
2 **JURISDICTIONS EMPLOY TO EXPAND SOLAR ACCESS TO LOW-**
3 **INCOME HOUSEHOLDS?**

4 A. Absolutely. Vote Solar has written a primer on expanding solar access to low-
5 income households.² We look forward to elaborating further on this menu of
6 programs and policy options—that other jurisdictions have considered or
7 adopted—at the appropriate time and in the appropriate docket.

8 **Q. WHAT IS YOUR RECOMMENDATION?**

9 A. I recommend that the Commission defer any consideration of low-income solar
10 policy and solar choice equity impacts to the forthcoming solar choice tariff
11 proceedings, where specific policy proposals can be more fully considered and
12 examined with interested stakeholders and parties.

13 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

14 A. Yes.

² www.lowincomesolar.org